

Federal Communications Commission
RE: MB Docket No. 04-232

Regarding FCC proposal to record and retain all programming for 60 to 90 days:

1. I support the motivation to enforce restrictions on obscene, indecent, and profane broadcasting. Enforcement is actually long overdue.

2. However, I am amazed at the proposal that has been advanced to handle enforcement. Why, in the name of common sense, does the FCC believe it is necessary to penalize the entire broadcast community for the sins of a tiny fraction?

3. The Commission must be well aware of the volume of responses from viewers and listeners when they detect an infraction. None of this happens "behind closed doors". This is known as broadcasting with untold numbers of witnesses.

4. I am certain that the Commission is also well aware of the specific programs, productions and persons that are repeatedly named as crossing the line.

5. A straightforward solution to our united concerns would be to require future recordings of those few who are obviously involved in questionable conduct and brought to the Commission's attention by the public. The complainants will retain evidence in unison of a licensee's behavior.

6. The Commission will certainly be able to determine by the number of complaints the gravity of a potential infraction. It can then weigh the differences between a single "word" that has inadvertently slipped through as compared to repeated and blatant disregard by the licensee concerning its responsibility.

7. Is this not the same government that has for years been pushing a reduction of "paperwork" and the like in an effort to help small business survive unnecessary inefficiencies and be most productive in its service to the public?

8. I suspect that those favoring such a broad mandate against each and every broadcaster with its attendant costs in equipment, personnel and record keeping have had limited experience in managing a small business, having to compete each day with all other media, and meet a payroll at the end of each work week, while serving the public interests.

9. Is this not the same Commission that approved the clearly competitive satellite delivery of video and audio services that bring a hundred or more channels and formats into each and every broadcast market ... yet without the same programming restrictions? The "F" word resounds continuously. Does it "ultimately" really matter that these off-air services are subscribed to for a small sum rather than being offered "free"? Is it not true that over 80% of the public will use a dish or cable to simply have convenient access to its "free" broadcast providers? So much for a level playing field.

10. It is my desire to see the FCC accomplish its goal (and America's) in the matter of curbing profanity over all the airways. Please don't shoot the rest of us who already agree with you in order to achieve that lofty goal.

Respectfully,

Richard C. Dean, CEO
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